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Attorney for Defendant-Movant
KRISTY LYNN FELKINS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:20-cr-00175-TLN
)	
Plaintiff,)	NOTICE OF REQUEST FOR SEALING
)	EXHIBIT C TO DEFENDANT-MOVANT
vs.)	KRISTY LYNN FELKINS'S SECOND
)	MOTION FOR COMPASSIONATE
KRISTY LYNN FELKINS,)	RELEASE UNDER 18 U.S.C. § 3582(c)(1)(A)
)	
Defendant-Movant.)	
)	
)	

NOTICE IS HEREBY GIVEN that Defendant-Movant KRISTY LYNN FELKINS, by and through her attorney, Carolyn M. Wiggin, Assistant Federal Defender, hereby requests an order permitting counsel to file Exhibit C to Defendant-Movant's Second Motion for Compassionate Release Under 18 U.S.C. § 3582(c)(1)(A)(i), under seal. Exhibit C contains medical information regarding Ms. Bushnell that is not for public record.

The sealing is requested pursuant to Eastern District Local Rule 141 and Federal Rule of Criminal Procedure 57(a)(1). The Court has inherent power to seal documents. *See United States v. Gurolla*, 333 F.3d 944 (9th Cir. 2003) (recognizing authority to accept submissions under seal); *see also United States v. Hickey*, 185 F.3d 1064 (9th Cir. 1999); *United States v. Hardwell*, 80 F.3d 1471, 1483-84 (10th Cir. 1996).

1 Exhibit C and the Request to seal that exhibit has been submitted to the Court and the
2 government by e-mail pursuant to Local Rule 141(b). The Court may file this notice in the
3 public record.
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6 DATED: April 3, 2025

Respectfully submitted,

7 HEATHER E. WILLIAMS
8 Federal Defender

9 /s/ Carolyn M. Wiggin
10 CAROLYN M. WIGGIN
11 Assistant Federal Defender

12 Attorneys for Defendant-Movant
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